Supreme Court, U.S.
FILED
APR 1 - 2010
OFFICE OF THE CLERK

No. 09-1073

In The Supreme Court of the United States

TAMMY J. SHAW,

Petitioner,

v.

LYNCHBURG DEPARTMENT OF SOCIAL SERVICES, *ET AL.*,

Respondents.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

RESPONDENT DR. A. J. ANDERSON'S BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

Respondent disagrees with the questions presented as set forth by Petitioner. Respondent states the questions presented as follows:

1. Whether the United States Court of Appeals for the Fourth Circuit properly affirmed the decision of the District Court holding that it lacked jurisdiction over Petitioner's 42 U.S.C. § 1983 claim pursuant to the Rooker-Feldman Doctrine.

2. Whether the United States Court of Appeals for the Fourth Circuit properly affirmed the decision of the District Court holding that Petitioner Shaw could not represent her children *pro se* for the purpose of claims under § 504 of the Rehabilitation Act and Title II of the ADA.

3. Whether Petitioner may raise an argument regarding the protections of the Due Process Clause for the first time in her Petition for a Writ of Certiorari.

LIST OF PARTIES

Respondent disagrees with the list of parties as set forth by Petitioner. Respondent states the parties are as follows:

Petitioner:

Tammy J. Shaw, *pro se*

Respondents:

Timothy Kaine, Governor of Virginia

Robert F. McDonnell, State Attorney General

Eleanor Dunn, Lynchburg Deputy City Attorney

Mark Johnson, Director of Lynchburg Department of Social Services

Lisa Parks, Department of Social Services

Sally Barca, Department of Social Services

Robert W. Moore, Lynchburg Police Department

Dr. A. J. Anderson

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The opinion of the United States Court of Appeals for the Fourth Circuit is reported at 332 Fed. Appx. 883 and is reproduced in the Appendix to the Petition for a Writ of Certiorari (hereinafter, "Pet. App.") at A. The opinion of the United States District Court for the Western District of Virginia, Lynchburg Division is reported at 2009 U.S. Dist. LEXIS 6659 and is reproduced in Pet. App. at B.

CONSTITUTIONAL AND STATUTORY PROVISIONS

Respondent disagrees with the constitutional and statutory provisions as set forth by Petitioner. Respondent states the constitutional and statutory provisions generally involved in this appeal are as follows:

1. U.S. Const. amend. XIV § 1;

2. 42 U.S.C. § 1983;

3. Rehabilitation Act of 1973 § 504, 29 U.S.C. § 794; and

4. Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12131, *et seq.*

STATEMENT OF THE CASE

Respondent disagrees with the statement of the case as set forth by Petitioners. Respondent sets forth the statement of the case as follows:

Petitioner, Tammy Shaw, (hereinafter "Shaw") filed her Amended Complaint with the United States District Court for the Western District of Virginia on November 24, 2008. Shaw represents herself, *pro se*, and through her Amended Complaint she attempted to set forth claims on her own behalf, and also on behalf of her minor children.

Shaw's ninety-six page Amended Complaint sets forth twenty-four "counts" against Virginia Governor Tim Kaine, Attorney General Bob McDonnell, various employees of the City of Lynchburg, and this Respondent, A. J. Anderson, Ph.D. (hereinafter, "Dr. Anderson"), a licensed clinical psychologist who conducted psychological evaluations of Shaw's children pursuant to a court order. Pet. App. at B, section I.

In his Memorandum Opinion dated January 29, 2009, the Honorable Norman K. Moon of the United States District Court for the Western District of Virginia, Lynchburg Division, (hereinafter "Judge Moon") addressed Shaw's twenty-four various "counts" as several individual claims. Id. Pertinent to Shaw's Petition for a Writ of Certiorari are Shaw's claims for: 1) deprivation of due process in violation

of 42 U.S.C. § 1983, 2) violation of Section 504 of the Rehabilitation Act of 1973, and 3) violation of Title II of the Americans with Disabilities Act.

With regard to her § 1983 claim, Shaw essentially alleged that the various Respondents violated her due process rights during investigations and judicial and administrative hearings conducted in the Juvenile and Domestic Relations Courts for the Cities of Lynchburg and Amherst, the Circuit Court for the County of Amherst, and before the Virginia Department of Social Services. See Amended Complaint; see also, Pet. App. at B, section I. Shaw contended that as a result of the Respondents' alleged behavior during these investigations and hearings regarding custody and child abuse allegations, her credibility was destroyed and she lost some custody rights over her children. Id.

Shaw's other two claims relate to her contention that two of the Respondents, Robert Moore and Sally Barca, both employees of the City of Lynchburg, failed to provide the assistance of a qualified speech therapist for the minor child CJS during an interview concerning allegations of sexual abuse by CJS' father. Id. Shaw contended that this failure violated Section 504 of the Rehabilitation Act of 1973 and Title II of the ADA. Id.

Judge Moon dismissed all three claims in his January 29, 2009, Memorandum Opinion. Pet. App. at B. Judge Moon held that the District Court

lacked jurisdiction over Shaw's § 1983 claim pursuant to the Rooker-Feldman doctrine. Furthermore, Judge Moon held that Shaw failed to state a claim under the Rehabilitation Act or ADA because Shaw was prohibited from litigating these claims *pro se* on her child's behalf. Id.

Shaw appealed Judge Moon's dismissal of these three claims to the United States Court of Appeals for the Fourth Circuit. The issues reviewed by the Court of Appeals, which are pertinent to the instant Petition for a Writ of Certiorari were: 1) whether the Rooker-Feldman doctrine was applicable to this case and 2) whether a parent could be prohibited from litigating *pro se* on behalf of her children. See Shaw's Informal Brief to the Fourth Circuit, Pet. App. at C.

On September 22, 2009, the Court of Appeals issued an unpublished *per curiam* opinion affirming Judge Moon's decision on both counts. Pet. App. at A. After reviewing the record, the Court found no reversible error and affirmed the ruling of the District Court for the reasons stated by Judge Moon in his opinion. Id.

Shaw has filed this Petition for a Writ of Certiorari (hereinafter "Petition"). She has presented three questions. Her first two questions relate to issues addressed by the District Court and the Court of Appeals for the Fourth Circuit, and concern, respectively: 1) whether the Rooker-Feldman

Doctrine applies in this case and 2) whether a non-lawyer parent can litigate *pro se* on behalf of her or her minor child. Shaw's third question presented was not addressed by either the District Court or the Court of Appeals, and is raised for the first time in her Petition. In this third question, she inquires whether the Due Process Clause safeguards citizens from unconstitutional "inactions" as well as "actions."

REASONS FOR DENYING THE PETITION

I. THE COURT OF APPEALS PROPERLY AFFIRMED THE DISTRICT COURT'S HOLDING THAT IT LACKED JURISDICTION OVER SHAW'S 42 U.S.C. § 1983 CLAIM PURSUANT TO THE ROOKER-FELDMAN DOCTRINE.

In her Amended Complaint, Shaw attempted to set forth a claim that the Respondents violated her due process rights under 42 U.S.C. § 1983. Shaw's allegations all arose out of issues relating to her underlying domestic relations cases. Her allegations related to the various Respondents' behavior during custody and child abuse hearings and investigations conducted in the Juvenile and Domestic Relations Courts for the Cities of Lynchburg and Amherst, the Circuit Court for the County of Amherst, and before the Virginia Department of Social Services. Shaw claims that as a result of the Respondents' behavior her credibility was destroyed and she lost some custody rights over her children.

With regard to this first question presented, the Petition should be denied for three reasons. First, the Rooker-Feldman Doctrine was appropriately applied by the District Court in this case. Second, Shaw has set forth no reason for granting her Petition with regard to the Rooker-Feldman Doctrine. Third, regardless of whether the Rooker-Feldman Doctrine precluded the District Court from exerting jurisdiction over Shaw's § 1983 claim, Judge Moon properly dismissed the claim.

A. The Court of Appeals properly affirmed the District Court's application of the Rooker-Feldman Doctrine in this case.

The Court of Appeals was correct in affirming Judge Moon's decision because the District Court lacked jurisdiction over Shaw's 42 U.S.C. § 1983 claim pursuant to the Rooker-Feldman Doctrine.

This Court recently held that the Rooker-Feldman Doctrine applies when the following conditions are met: (1) the federal court plaintiff lost in state court; (2) the plaintiff complains of "injuries caused by state-court judgments;" (3) the state court judgment was rendered before the proceedings in federal court commenced; and (4) the federal plaintiff "invit[es] district court review and rejection of those judgments." Exxon Mobil Corp. v. Saudi Basic Indus. Corp., 544 U.S. 280, 284, 125 S. Ct. 1517, 1522 (2005).

Analyzing this Court's opinion in Exxon Mobile Corp., the Fourth Circuit Court of Appeals has stated, "[i]f the state-court loser seeks redress in the federal district court for the injury caused by the state court decision, his federal claim is, by definition, 'inextricably intertwined' with the state-court decision, and is therefore outside the jurisdiction of the federal district court." Davini v. Virginia Dep't Transp., 434 F.3d 712, 719 (4th Cir. 2006)(internal citations omitted).

In the case below, all of the conditions set forth by this Court in Exxon Mobil Corp. were met. First, Shaw lost several protective order and custody hearings throughout 2006 in the Amherst and Lynchburg J&DR and Circuit Courts. Amended Complaint, Count 10, pp. 1-9, Count 14, p. 1; see also, Pet. App. at B, sections I and III.A. Second, Shaw alleges that Respondents' actions caused damage to her credibility, caused her to lose these various protective order and custody hearings, and injured her by resulting in loss of certain of her custody rights. Id.; Pet. App. at B, section I. Third, the judgments of the J&DR and Circuit Courts were rendered prior to the institution of Shaw's federal action on July 28, 2008. Amended Complaint, Count 10, p. 6. Fourth, Shaw, through her Amended Complaint, sought that the District Court review and reject the various judgments of the state J&DR and Circuit Courts.

Judge Moon specifically noted that Shaw was seeking redress in the federal court for the injuries allegedly caused by the state court decisions. In his January 19, 2009 memorandum opinion, he held, "[r]ecognizing that Shaw's due process rights were violated in light of the defendants' alleged misconduct would require a determination that one or all of the state courts wrongly decided the issues before them." Pet. App. at B, section III.A. The Court of Appeals affirmed "for the reasons stated by the district court." Pet. App. at A.

Moreover, Shaw's federal case arose solely out of the domestic relations matters in the J&DR and Circuit Courts. This Court has recognized that "[t]he whole subject of the domestic relations of husband and wife, parent and child, belongs to the laws of the States, and not to the laws of the United States." In re Burrus, 136 U.S. 586, 593-94, 10 S. Ct. 850, 853 (1890); Boggs v. Boggs, 520 U.S. 833, 848, 117 S. Ct. 1754, 1764 (1997). Shaw was seeking redress of these domestic relations matters in federal court, and therefore the Rooker-Feldman doctrine applied.

Accordingly, because the District Court lacked jurisdiction under the Rooker-Feldman Doctrine, the Court of Appeals properly affirmed its application, and Shaw's Petition should be denied.

B. Shaw has set forth no reason for granting her Petition with regard to the application of the Rooker-Feldman Doctrine.

Rule 14.2 requires that "[a]ll contentions in support of a petition for a writ of certiorari shall be set out in the body of the petition, as provided in subparagraph 1(h) of this Rule." Sup. Ct. R. 14.2. Subparagraph 1(h), in turn, mandates that the Petitioner must provide "[a] direct and concise argument amplifying the reasons relied upon for allowance of the writ." Sup. Ct. R. 14.1(h). Failure to present "with accuracy, brevity, and clarity whatever is essential to ready and adequate understanding of the points requiring consideration is sufficient reason" for denial of a petition. Sup. Ct. R. 14.4.

Shaw vaguely contends that dismissal of her 42 U.S.C. § 1983 claim "was due to the alleged improper use of the Rooker-Feldman Doctrine." See Petition, p. 7. She further alleges that the use of the Rooker-Feldman Doctrine "conflicts with a relevant decision of the U.S. Supreme Court." Id. p. i.

Nonetheless, Shaw has not set forth any facts or contentions to support her conclusion that the Rooker-Feldman Doctrine does not apply in this case. She has similarly identified no case conflicting with the decisions of Judge Moon and the Court of Appeals in this case. She has made no argument amplifying the reasons relied upon as a basis for her

Petition. Therefore, she has not adequately presented the essential points for consideration, and her Petition should be denied.

C. Shaw's 42 U.S.C. § 1983 claim was properly dismissed.

Finally, regardless of whether the Rooker-Feldman Doctrine precluded the District Court from exerting jurisdiction over Shaw's 42 U.S.C. § 1983 claim, Judge Moon properly dismissed the claim. The Court of Appeals, after reviewing the record, found no reversible error in this decision. Pet. App. at A.

Shaw failed to state a claim for violation of her due process rights pursuant to § 1983. She failed to allege facts indicating that she was deprived of rights guaranteed by the Constitution or laws of the United States, and that such deprivation resulted from conduct of a person acting under the color of state law. See West v. Atkins, 487 U.S. 42, 48, 108 S. Ct. 2250, 2254 (1988). Furthermore, Dr. Anderson enjoyed quasi-judicial immunity for his actions relating to this case, as he was a licensed clinical psychologist, conducting evaluations of the children pursuant to court order. See e.g. Brown v. Newberger, 291 F.3d 89 (1st Cir. 2002); Hughes v. Long, 242 F.3d 121, 126 (3d Cir. 2001); Ostrzenski v. Seigel, 177 F.3d 245, 249 (4th Cir. 1999); Turney v. O'Toole, 898 F.2d 1470 (10th Cir. 1990). Therefore, Judge Moon's dismissal of Shaw's § 1983 claim was properly affirmed.

II. THE COURT OF APPEALS PROPERLY AFFIRMED THE DISTRICT COURT'S HOLDING THAT SHAW COULD NOT REPRESENT HER CHILD *PRO SE* FOR THE PURPOSES OF CLAIMS UNDER SECTION 504 OF THE REHABILITATION ACT AND TITLE II OF THE ADA.

In her Amended Complaint, Shaw attempted to set forth claims, on behalf of her minor child CJS, for alleged violations of Section 504 of the Rehabilitation Act and Title II of the ADA. These claims arose out of Shaw's allegations that employees of the City of Lynchburg failed to provide the assistance of a qualified speech therapist for CJS during an interview concerning allegations of sexual abuse by CJS' father. Opp. App. at A.

With regard to this second question presented, Shaw's Petition should be denied for two reasons. First, Judge Moon properly dismissed these claims because Shaw is prohibited from bringing these claims *pro se* on her minor child's behalf. Second, Shaw has set forth no reason or argument for granting her Petition with regard to the claims for which she attempted, *pro se*, to represent her child.

A. The Court of Appeals properly affirmed the District Court's holding that Shaw could not represent her child *pro se* in this case.

This Court has not yet addressed whether a parent may generally represent her minor children *pro se*. However, numerous circuits have addressed the issue, and determined that a non-lawyer parent cannot generally litigate on behalf of his or her children in federal court.

The United States Court of Appeals for the Fourth Circuit addressed this issue in 2005 and held, "[t]he right to litigate for *oneself* . . . does not create a coordinate right to litigate for *others*." Myers v. Loudoun County Pub. Sch., 418 F.3d 395, 400 (4th Cir. 2005). In Myers, the Court of Appeals adopted the rule that *pro se* parents are typically not permitted to litigate their children's claims, stating, "[w]e therefore join the vast majority of our sister circuits in holding that non-attorney parents generally may not litigate the claims of their minor children in federal court." Id. at 401.

Indeed, the restriction against a parent litigating on behalf of her child's rights without counsel is almost unanimous among the federal circuits. See Elustra v. Mineo, 595 F.3d 699 (7th Cir. 2010) (citing Navin v. Park Ridge Sch. Dist., 270 F.3d 1147, 1149 (7th Cir. 2001)); Berrios v. New York City Hous. Auth., 564 F.3d 130, 133-34 (2nd Cir. 2009) (citing Cheung

v. Youth Orchestra Found. Buffalo, Inc., 906 F.2d 59, 61 (2d Cir. 1990)); Shepherd v. Wellman, 313 F.3d 963, 970 (6th Cir. 2002); Devine v. Indian River County Sch. Bd., 121 F.3d 576, 581 (11th Cir. 1997); Johns v. County of San Diego, 114 F.3d 874, 877 (9th Cir. 1997); Oseai-Afriyie v. Med. Coll. Pennsylvania, 937 F.2d 876, 882 (3d Cir. 1991); Meeker v. Kercher, 782 F.2d 153, 154 (10th Cir. 1986).

The rationale for this rule is that a minor's personal cause of action is her own, and does not belong to her parent. See Shepherd, 313 F.3d at 970. It would risk the rights of the child to permit a layman to litigate for her. See Myers, 418 F.3d at 400. Furthermore, permitting laymen to practice law on behalf of others would be prejudicial to the opposing party, who then would have to guard against "poorly drafted, inarticulate, and vexatious claims." Id. (internal citations omitted).

Judge Moon noted this reasoning in his memorandum opinion. Pet. App. at B, section III.B. He further stated, "[b]ecause any alleged actions by Barca or Moore would be violations of CJS's (not Shaw's) rights . . . Shaw lacks standing to litigate those claims *pro se* on CJS's behalf." Id.

Therefore, the Court of Appeals appropriately affirmed Judge Moon's dismissal of Shaw's claims on behalf of her minor child. Her Petition should be denied.

B. Shaw has set forth no reason for granting her Petition with regard to her claims on behalf of her minor children.

Rule 14.2 requires that "[a]ll contentions in support of a petition for a writ of certiorari shall be set out in the body of the petition." Sup. Ct. R. 14.2. Subparagraph 1(h), in turn, mandates that the Petitioner must provide "[a] direct and concise argument amplifying the reasons relied upon for reasons relied on for allowance of the writ." Sup. Ct. R. 14.1(h). Failure to so set forth "with accuracy, brevity, and clarity whatever is essential to ready and adequate understanding of the points requiring consideration is sufficient reason" for denial of a petition. Sup. Ct. R. 14.4.

Shaw states in her Petition that "[t]he [District Court's] dismissal [of her claims] relied upon the making of a decision based on a federal question of which the U.S. Supreme Court has not ruled." See Petition, p. 7. She further states that the "Court of Appeals affirmed the decision of the District Court not to allow the non-lawyer parent, petitioner to litigate pro se in a federal court action on behalf of a child, an important federal question that has not been, but is requested to be, settled by the U.S. Supreme Court." Id. p. i.

Nonetheless, in her Petition, Shaw does argue that a non-lawyer parent should be generally permitted to represent her children *pro se*. She does not set forth

any facts or reasoning to support a conclusion that she should have been permitted to represent her minor children in this case. She cites no case, statutory, or constitutional law to support a contention that she should be permitted to represent her children *pro se* in a federal case. Therefore, she has not adequately set forth the essential points for consideration and her Petition should be denied.

III. SHAW'S CONTENTION REGARDING THE DUE PROCESS CLAUSE AND "ACTIONS" AND "INACTIONS" IS VAGUE AND CONFUSING AND IS AN ISSUE THAT HAS BEEN RAISED FOR THE FIRST TIME IN HER PETITION.

In her third question presented, Shaw states, "[t]he U.S. Supreme Court has not ruled on the Constitution proclaiming safeguards positive as well as negative in protection of rights and liberties of its citizens. A ruling regarding 'inactions' triggering the Due Process Clause in the same manner as 'actions' could assure equal protection of the law." See Petition, p. i. She elaborates, "[t]he Amended Complaint contains specifics of the actions and inactions by the respondents that are alleged as wholly arbitrary and irrational, providing a clear example of the oppression existing in our land, creating a need for federal interest." Id. at 8.

It is unclear what Shaw is contending by these statements. Furthermore, these prohibitively vague contentions do not set forth any alleged error by the

Courts below. She does not clearly set forth any points for consideration or any reasons that her Petition should be granted with regard to her third question presented. See Sup. Ct. R. 14.1(h) and 14.4.

Finally, this Court has held that it "ordinarily will not decide questions not raised or litigated in lower courts." City of Springfield v. Kibbe, 480 U.S. 257, 259, 107 S. Ct. 1114, 1115 (1987); see also Singleton v. Wulff, 428 U.S. 106, 120, 96 S. Ct. 2868, 2877 (1976)(holding that it is the general rule that "a federal appellate court does not consider an issue not passed upon below."). Because Shaw did not raise this argument in either the District Court or with the Court of Appeals, her Petition should be denied.

CONCLUSION

A. J. Anderson, Ph.D., by counsel, respectfully requests that this Court deny the Petition for a Writ of Certiorari.

Respectfully submitted,

A. J. ANDERSON, Ph.D.

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